

EXHIBIT NO. 22

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

VIVIAN BERT, et al.,

Plaintiffs,

Y.

AK STEEL CORPORATION,

Defendant.

CASE NO. C-1-02-467

Judge Beckwith

Magistrate Judge Hogan

STATEMENT OF ADEQUACY OF PLAINTIFFS' COUNSEL

Plaintiffs' Counsel David Sanford, of Sanford, Wittels & Heisler, LLP, is an experienced class action attorney. He has represented, and continues to represent, thousands of African American class members and female class members in Title VII class actions in federal courts throughout the United States, as well as thousands of employees in wage and hour class actions in federal and state courts. He has been lead and co-lead class counsel in numerous employment race and gender discrimination class action matters, including:

- (1) Clemon, et al. v. Cooker Restaurants, Middle District of Florida, Tampa Division
Case No. 8:99-CV-2129-T-27C (settled)
- (2) Jobe, et al. v. TRW, Inc., Middle District of Tennessee, Nashville Division
(settled)
- (3) Smith, et al. v. Cinergy Corp., Court of Common Pleas, Hamilton County, Ohio
Case No. A0302263 (in litigation)

- (4) Williams, et al. v. Gulfstream, Central District of California, Eastern Division
Case No. 02-CV-1200 (settled)
- (5) Rhodes, et al. v. Cracker Barrel, Northern District of Georgia, Rome Division
Case No. 4:99-CV-217 (settled)
- (6) NAACP, et al. v. Cracker Barrel, Northern District of Georgia, Rome Division
Case No. 4:01-CV-325 (settled)
- (7) Burton, et al. v. Toshiba, Middle District of Tennessee (Nashville Division)
Case No. 3:01-CV-0021 (settled)
- (8) Wade, et al. v. Kroger, Western District of Kentucky (Louisville Division)
Case No. 3:01-CV-699-R (in litigation)
- (9) Adkins, et al. v. Goody's, Middle District of Georgia (Albany Division)
Case No. 1:99-CV-28-4 (settled)
- (10) Wilson, et al. v Fairfield, Middle District of Tennessee (Nashville Division) (settled)
- (11) Cabell v. Merck, Eastern District of Pennsylvania, Philadelphia Division
Case No. PA: 01-CV-1005 (in settlement)
- (12) Bennet v. Nucor Steel, Western District of Arkansas, El Dorado Division
Case No.: 03-CV-1180 (in litigation)
- (13) Armstrong, et al. v. Whirlpool Corp., Middle District of Tennessee, Nashville Division
Case No.: 3-03-1250 (in litigation)
- (14) Velez, et al. v. Novartis Corp., Southern District of New York (in litigation)
- (15) Thomas, et al. v. General Electric, District of Connecticut (settled)
- (16) Barrett, et al. v. Whirlpool Corp., Middle District of Tennessee, Nashville Division (in

litigation)

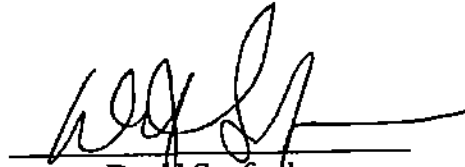
- (17) Williams, et al. v. Federal Aviation Administration, EEOC Case No. 100-2004-00491X
(in litigation)
- (18) Howard, et al. v. Department of Commerce, U.S. District Court for the District of
Columbia (in litigation)
- (19) Jones, et al. v. Shaw Carpets (in settlement negotiations)
- (20) Tarrats, et al. v. FDIC (EEOC)
- (21) Leonard, et al. v. Southtec, LLC, et al., Middle District of Tennessee, Nashville Division
(in settlement negotiations)
- (22) Murphy, et al. v. Super Steel, Northern District of New York, Albany Division (in
litigation)

In addition, David Sanford is and has been class counsel in numerous collective action Fair Labor Standards Act matters throughout the United States; is and has been counsel in numerous individual and multi-party employment matters across the United States; has tried Title VII matters before a jury and district courts; has litigated commercial and class matters throughout the United States in connection with his work with David Boies at Boies & Schiller; has drafted petitions of certiorari to the United States Supreme Court in connection with his work in the Appellate Division of Jones Day Reavis & Pogue; and has served as a judicial clerk to Judge Gladys Kessler of the United States District Court for the District of Columbia.

David Sanford is a member in good standing with the District of Columbia Bar and the Maryland Bar. With the extensive class action experience in race discrimination matters, along with other class actions he has litigated, and his litigation experience in other contexts, David

Sanford will adequately, zealously, and vigorously represent the interests of the class as class counsel.

6/7/06
Date


David Sanford

Sworn to and subscribed before
me this 7th day of June, 2006


Notary Public

